

Buy Now...Pain Later?



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Summary

Millions of people in the UK have used a buy now pay later (BNPL) product in the last year.

BNPL is a financial product that lets people split or delay payments to make them more manageable in the short-term. Whilst this is helpful for some, as a credit product it is inherently risky.

The customer journey should, therefore, be designed with care to protect people from harm. However, **our research suggests the current customer journey lacks the information, affordability checks and care necessary to stop people falling into debt.**

The design of buy now pay later is slippery

BNPL is marketed as a smooth and easy payment method. However, this lack of friction allows people to enter a BNPL agreement too easily without fully understanding what it is. In fact, many people use it by accident because it's the default payment method on a retailer's website.

There is often a lack of information at the checkout to help people understand that BNPL is a credit product and what the consequences will be if they're not able to make repayments.

Of people who've used BNPL in the last year:

39% used it without realising

40% think BNPL isn't "proper" borrowing

42% didn't fully understand what they were signing up for

The way buy now pay later is presented encourages people to spend more than they can afford

Buy now pay later providers market themselves to retailers as being able to significantly increase their sales. Their use of offers, adverts, the placement at checkouts and the way information is presented all encourages people to spend more money.

Combined with inconsistent affordability checks, this encourages people to spend more than they can afford and leads too many people into debt as a consequence.

Providers' practices are inconsistent

BNPL providers' approaches to information provision, how payments are made, late fees and debt collection vary significantly. Combined with the current lack of regulation, this means there is no baseline for what people can expect when they use BNPL, and no guaranteed protections or support if things go wrong.

Regulation should focus on product design and customer protection

Citizens Advice welcomes the government and FCA's decision to regulate BNPL products. To fully protect customers, regulation should focus on:

1. How product design impacts decision making.
2. What information customers need to make an informed decision and how that information should be presented.
3. How to ensure affordability is central to buy now pay later products.
4. Ensuring customers in financial difficulty are treated in a fair and consistent way.

Buy now pay later in numbers

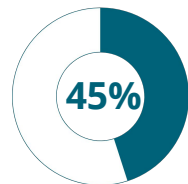
How it's used

14 million people

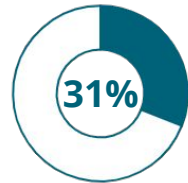
have used buy now pay later in the last 12 months.

On average, people who use BNPL are paying for **2 products** at a time and are paying back **£63 per month**.

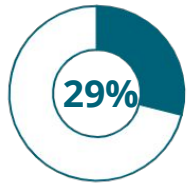
The main reasons people use BNPL are:



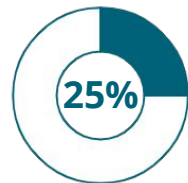
To spread payments



To delay payments



Because it's easy to use



Not being able to afford the item otherwise

The problems

26% have regretted using buy now pay later

41% of users have struggled to make a repayment

Half of BNPL users have another debt to manage alongside their BNPL repayments



2 in 5 people who used BNPL in the last year have done so **without realising**

What is buy now pay later?

9 in 10 people have heard of buy now pay later, but what is it?

Buy now pay later (BNPL) is a credit product that allows people to spread or delay the cost of their purchase.

The major BNPL providers in the UK include Klarna, Clearpay, Laybuy, Openpay and PayPal.¹

BNPL is often offered as a payment option at an online retailer's checkout. Most providers allow customers to pay for their purchase in instalments over a number of weeks or months. Some also offer an option to delay payment, for example by 30 days.

Buy now pay later providers often market their services to retailers as being able to increase the sales that retailers will achieve.

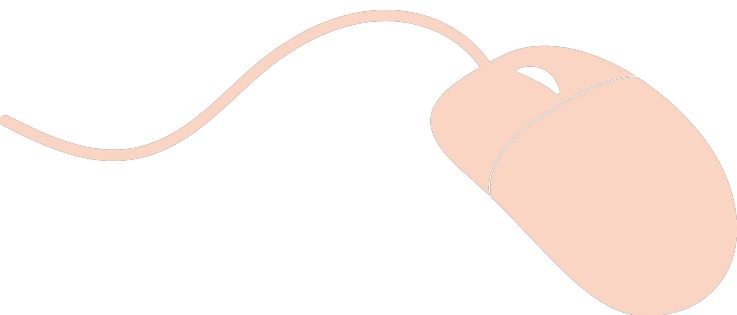
BNPL is currently unregulated

The type of buy now pay later product we refer to in this report is currently unregulated. Whilst there are other types of BNPL that are regulated, the service used by many online retailers makes use of an exemption in the regulation for payments involving a maximum of 12 instalments over a maximum period of 12 months.

Despite being unregulated, 43% of adults believe BNPL services are regulated like other types of borrowing.

In the Woolard Review into the unsecured credit market, the FCA recommended that amendments are made to legislation to bring BNPL into the scope of regulation.

Citizens Advice welcomes the move to regulate buy now pay later services and will use our evidence of customer experiences to advocate for what that regulation should look like.



Who uses buy now pay later?

27% of UK adults have used buy now pay later in the last year

Age

- 45% of 18-34 year olds
- 31% of 35-54 year olds
- 11% of over 55s



35% of people in debt



43% of people who had their employment impacted by coronavirus

Gender

- 28% of women
- 26% of men
- 25% of cisgender people
- 80% of transgender people

What do people use BNPL to buy?



33% used it to buy electronics

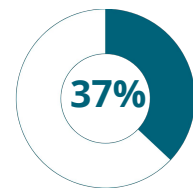
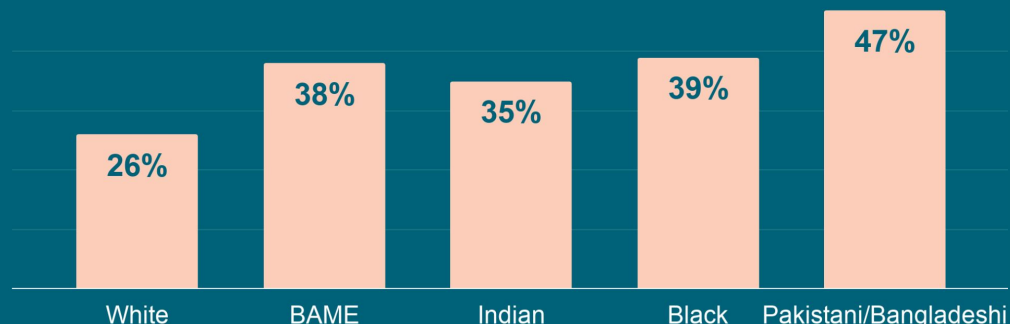


29% used it to buy clothes

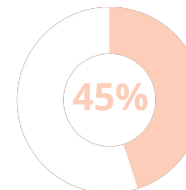


24% used it to buy white goods

Ethnicity



of disabled people



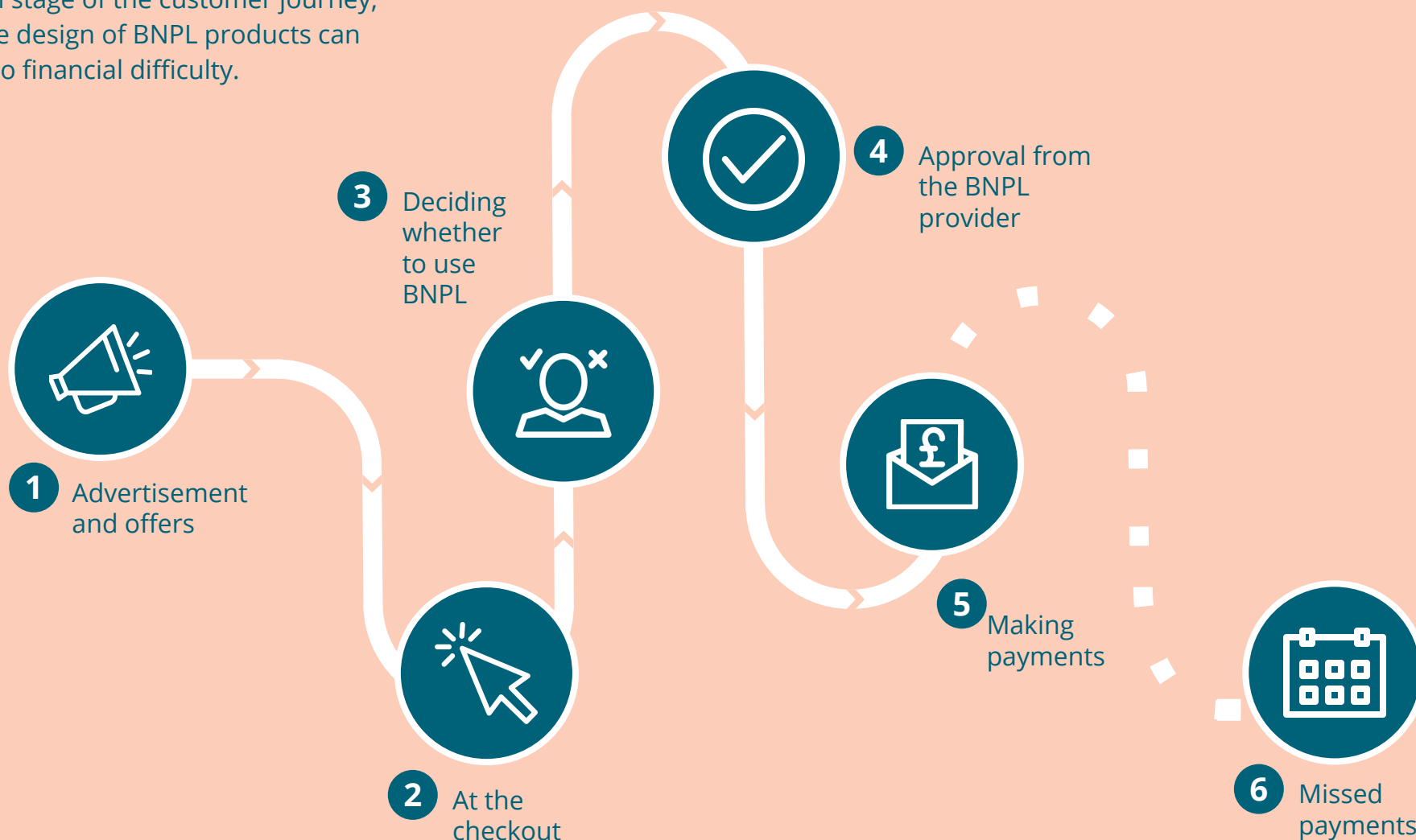
of people with a mental health problem

The average buy now pay later user has used it 5 times in the last year

On average people are paying back £63 per month

The BNPL customer journey

A typical BNPL customer will go through the first 5 stages of the journey below, with some going on to miss their repayments. We'll take a look at each stage of the customer journey, and how the design of BNPL products can contribute to financial difficulty.



There are problems at each stage of the customer journey

Adverts don't always make it clear enough that BNPL is a credit product.

Some adverts promote **unaffordable** spending as an aspirational lifestyle.

Some retailers **offer discounts** for using BNPL.



Advertising and offers

BNPL is often the **default payment option** on retailers' websites.

The process of signing up to BNPL is **slippery**.

There's **not enough information** on what BNPL is and the consequences of non-payment.



At the checkout

The design of the checkout page often **encourages people to spend more than they can afford**.

BNPL often isn't presented as a **serious credit product**.



Deciding whether to use BNPL

Not all BNPL providers conduct **affordability checks**.

Spending limits set by providers are **inconsistent**.

When people use BNPL products with multiple providers it quickly becomes unaffordable.



Approval from the BNPL provider

Information about setting up payments is often missing from the checkout.

Methods for setting up payments are inconsistent.



Making payments

Support for people in financial difficulty is inconsistent.

Many providers charge late fees and some refer people to debt collectors.



Missed payments



Advertising and offers

Before people get to a checkout, they're very likely to have been exposed to advertising and offers for buy now pay later.

2 in 5 people have heard of BNPL through an advert in the last year.

This increases to **more than half** of people who've used BNPL in the last 12 months. Many people first hear of BNPL through advertising, making it key in shaping their perceptions and likelihood of using it.

People are most likely to see BNPL advertised on social media

Among people who have seen BNPL advertised:

1. 57% have seen it advertised on social media e.g. Instagram, Twitter or TikTok
2. 50% have seen it advertised on television
3. 14% have seen it advertised in physical spaces e.g. billboards and bus stops

Advertising is targeted towards young people

Young people are much more likely to see BNPL adverts than any other age group. **60%** of people aged 18-34 have seen BNPL adverts compared to 38% of 35-64 year olds and 24% of over 65s.

BNPL adverts often encourage unaffordable spending

Adverts for BNPL often promote how easy to use and straightforward it is. They also market the benefits of splitting or delaying payments to buy things that would previously be out of reach. This includes promotions with social media influencers that can portray purchases as easy and aspirational.

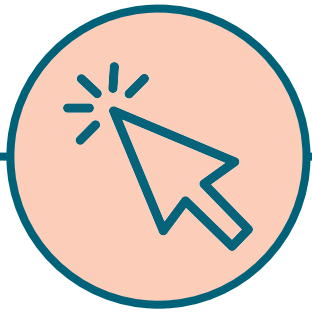
However, typically these adverts don't make it clear enough that BNPL is a credit product, and can encourage people to spend money on things that are unaffordable.

Retailers offer discounts for using BNPL

Many retailers offer promotions such as discounts or free delivery for customers who pay using BNPL. This can encourage people to use BNPL where they might not have otherwise. 1 in 6 BNPL users say one of the main reasons they last paid for something using BNPL was because an offer made it cheaper than buying outright. There is a risk that these tempting offers make it harder for people to resist using a payment method that isn't right for them.

Advertising affects people's perceptions of the industry.

Adverts also affect what people believe is true about BNPL. 53% of people who have seen BNPL advertised think it's true that the industry is regulated compared to 38% of people who haven't seen adverts. This leaves them at risk of making decisions under the assumption that they'll be covered by certain protections.



At the checkout

Most people's first opportunity to

actually use buy now pay later is at the checkout.

BNPL is often the default payment option at the checkout

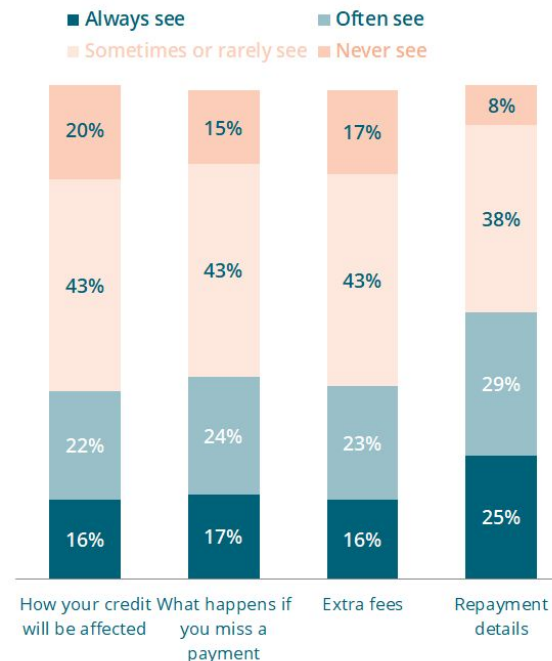
As BNPL is a credit product, it's important that people are making informed choices to use it. However, some retailers offer BNPL as their default payment option, leading many people to use it without even realising they've done so.

- 2 in 5 people who have used BNPL in the last year have ended up using it without realising.
- Over 3 in 5 people who've heard of BNPL have seen it as a default payment method at some point.

A credit product should not be so easy to sign up to that people can do it without realising.

Often there isn't enough information to make an informed decision

At the checkout retailers should help people develop an understanding of what they're paying for and how. But as fig 1. shows, when it comes to BNPL, this is done inconsistently. Too many people aren't being shown key terms and information to help them understand exactly what they're signing up to.



When this information is present at the checkout, it's often in small print or requires clicking on a link to access it, meaning people can easily miss it.

Without relevant information at the checkout about what BNPL is, how using it will work and the full costs involved, people are unable to make a fully informed decision on whether it's right for them.

Whether people use BNPL by accident or on purpose, the lack of information can leave them at risk of taking out unaffordable agreements, not understanding how to make repayments, and being unaware of late fees and hidden costs.

The layout of the checkout page and the smooth process leaves people little time to stop and think about their purchase and how they're paying for it.


The typical checkout design

This is an example of a payment section at an online checkout. It's based on our mystery shopping of online retailers that offer BNPL products. It shows the common techniques that are used at this stage to influence consumer decision making:

Often text and graphics focus more on the costs of instalments than how much people will pay altogether.

People are already likely to overestimate their ability to make repayments, and focus on present rather than future payments.² Presenting payment information like this risks giving consumers a false sense of how much they're spending, and how much they can afford, which can encourage them to add more to their basket.

When 'save for future use' is automatically selected it makes BNPL the default payment option for people next time without them realising.

Shop now, pay later! With YPay!		10% off when you pay using YPay Code: YPAY10	
PROMO/STUDENT CODE:		YPAY10 YPAY10 saving 10% (-£10)	
Payment type		CHANGE	
Pay in 3 instalments with YPay			
<input type="checkbox"/> 3 interest free payments of £31.32			
£31.32 today £31.32 in 30 days £31.31 in 60 days			
			
<ul style="list-style-type: none">Shop now and pay later in three interest-free instalments.			
<div>Card number</div> <div>MM/YY CVC</div>			
<small>Eligibility criteria applies to use this credit offer. YPay uses a soft search with credit reference agencies. This will not affect your credit rating. By continuing I accept the YPay terms. Pay no fees when you pay on time.*</small>			
<input checked="" type="checkbox"/> Save for future use			
DATE OF BIRTH:		<input type="text"/>	
YPay needs your date of birth to confirm your identity. You must be 18 years of age to use YPay.			
<input type="checkbox"/> MORE INFO			
PAY NOW WITH YPAY			

Prominent banners advertising BNPL.

Discount codes for using BNPL.

There's often little mention of BNPL being a credit product, and it may be in small print. Information on the consequences of missing payments (e.g. late fees) is also frequently missing, in the small print or requires clicking on another link to access it.

Having to click through to view information adds an extra obstacle to understanding the product.



Deciding whether to use BNPL

There are many factors that influence someone's decision on whether or not to use buy now pay later at the checkout.

Perceptions

How people feel about BNPL and how well they understand it influences how likely they are to use it. Many use BNPL because they don't see it as a serious credit product and don't understand the consequences if they're unable to pay. 40% of BNPL users don't view it as 'proper borrowing', and 42% say they didn't fully understand what they were signing up to.

Offers

Many retailers will offer discounts on products exclusively if customers use BNPL as their payment method. 1 in 6 BNPL users say the main reason they last used it was because an offer made the item cheaper if paying through BNPL.

Urgent needs

1 in 4 people who have used BNPL did so because they couldn't afford an item otherwise. Sometimes this is because a person needs an item now that they can't pay for at the time. 13% of people who've used BNPL did so because it was an emergency, and 29% of people who haven't used BNPL would use it in an emergency.

Affordability

The most common reasons that people use BNPL are because it lets them spread or delay payments. Sometimes this is helpful because an individual urgently needs an item. At other times it can encourage people to spend more than they can afford. Evidence shows that people tend to be overconfident in their ability to make repayments in the future and are likely to overestimate their affordability.³

Payment information at the checkout often emphasises the price of the first instalment rather than the total cost. This can encourage people to spend more as the sum they're due to pay today is lower.

Convenience and availability

29% of people use BNPL because it's easy. For some, simply the availability of BNPL at a checkout makes them more likely to use it. For others, BNPL is convenient if they plan to buy multiple items in different sizes and return some of them.





Approval from the BNPL provider

When someone decides to purchase an item using buy now pay later, it's down to the BNPL provider to decide whether to approve that purchase.

Buy now pay later is a credit product, so affordability is important.

1 in 4 people who have used buy now pay later say it was because they couldn't afford the item otherwise.

BNPL can be helpful when people need an item now that they'll be able to afford next month. However, it can also encourage people to spend more than they can afford altogether - whether it's now or next month.

In the last year, **1.4 million people have regretted using BNPL because they spent more than they could afford.**

Spending more than they can afford is the number 1 reason people give for regretting using BNPL.

BNPL users are also more likely to be in financial difficulty. **52% of people who have used BNPL in the last year have another debt to manage alongside their BNPL payment.**

Given the financial circumstances of many BNPL users, and the risks of spending more than is affordable, BNPL providers should be careful to define responsible spending limits.

BNPL providers' approaches to affordability aren't consistent.

When someone decides to use buy now pay later, the provider will give them a spending limit. This limit varies by individual and BNPL provider.

Some BNPL providers conduct hard credit checks, others don't conduct any credit checks. Some will offer lower spending limits to new customers, and will either increase or decrease these limits based on whether the customer misses any payments.

Providers also differ on how many products they allow people to pay for at any one time.

The picture is mixed when it comes to affordability checks. Some firms are better than others at ensuring people don't spend more than they can afford. The problem is that, currently, there is no consistent approach to affordability. This means individuals can't expect the same protection from one company to the next.

Often BNPL users will be paying for a number of products across multiple providers at one time. Each BNPL provider doesn't know how much a person is spending with a different provider. This makes it difficult to understand how many products a person has taken out overall and whether they'll be able to afford a new BNPL product on top of their existing ones.



Making payments

Signing up to use buy now pay later is a smooth process - so smooth that people frequently use it without realising. However, when it comes to making repayments, the process isn't always so straightforward.

The method for making repayments differs depending on the provider.

Some providers set up repayments automatically when used at the checkout, whilst others require users to schedule their own payments, for example through an app.

Confusion over how repayments are made can lead people to miss payments. This can be because they're not able to set payments up or because they don't have enough money in their account when an automatic payment takes place.

It's easy for people to get confused about how repayments will be made, as often this information isn't provided at the checkout.

When we conducted mystery shopping of major online retailers that offer BNPL, the **majority did not provide information about how to make repayments at the checkout.**

3 in 10 buy now pay later users have been charged a fee they weren't expecting. Often this was down to problems setting up payments:

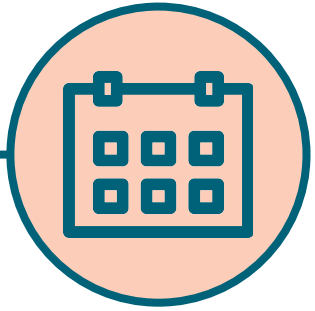
- 22% said it was because they had a technical problem setting up payments
- 19% didn't know the date of the payment
- 19% didn't know how to set up a payment
- 18% didn't have the money for a scheduled payment

This becomes particularly complicated for people who take out multiple products with different providers.

Depending on the provider, payments can come out every week, fortnight or month. Combine this with differences in payment method, and keeping on top of several BNPL purchases can become very complicated.

1 in 4 people who regretted using BNPL said it was because of a complicated payment process.





Missed payments

More than 2 in 5 BNPL users have struggled to make a repayment.

It's all too common for BNPL users to face problems making payments. Regardless of whether this is because of a technical problem with making a payment, trouble keeping up with multiple payments, or a payment being unaffordable, missing a payment has financial consequences.

Often BNPL providers market themselves as being free to use and without fees, but too many users have fallen prey to late fees and hidden costs.

3 in 10 BNPL users have faced a fee they didn't expect.

Approaches to late fees and debt collection are inconsistent.

Some BNPL providers charge late fees, whilst others don't. For those that do charge late fees these can range from £6 to £12. Most of the leading providers offer caps on the total value of late fees users can incur on a product, but these are also inconsistent, ranging from £15 to £36.

For those who have taken out multiple buy now pay later products across different providers, late fees can add up to a significant amount.

Approaches to debt collection also vary significantly. Some BNPL providers pass debts onto debt collection agencies, while others write users' debt off.

It's often not clear at the checkout that missed payments can have such serious repercussions.

Efua's story



Efua took out a £300 pay-in-3 agreement to buy some furniture. Shortly after this, she lost her bank card and had to order a new one. She wasn't able to link her new card with her BNPL payments and was unable to get help from customer support. This meant that Efua missed her payment instalments and was charged £70 in fees on top of the £300 she still had to repay.

Problems with BNPL can have a serious financial impact

For too many people who've taken out a buy now pay later product, missing a payment and incurring a fee is just the first step in facing a heavy financial burden that they didn't anticipate.

1 in 4 people have regretted paying for something using BNPL.

The most common reasons for this have been:

1. Spending more than they could afford (37%)
2. Paying more than expected (37%)

While most BNPL providers have caps on how much people can be charged in late fees, people can still face significant difficulty if they are paying for several products with different providers.

When people are encouraged to spend more than they can afford in the first place, the financial impact goes beyond late fees.

When care isn't taken to conduct affordability checks, people are left struggling to get by with unaffordable repayments.

2 in 5 BNPL users have been unable to pay for essentials such as food, rent or bills because they were making payments for a BNPL product.

The financial impact is even starker for those with existing debts.

52% of people who have used BNPL in the last 12 months have another debt or repayment to manage alongside their BNPL payments.

1 in 5 people that have other debts to repay say that these only started after they first used BNPL.

For those already in debt when they started using BNPL, 17% have seen their debt get worse in the last year and 45% attribute this to using BNPL.

Buy now pay later has a knock on impact on people's other debts. 2 in 3 have prioritised paying a BNPL fee or repayment instead of another debt or repayment.

The financial impacts of struggling with buy now pay later purchases are long-lasting. 2 in 5 BNPL users have had their credit score impacted by using BNPL.



Marginalised people face even more hardship from using BNPL...

The impact of BNPL on finances doesn't hit everyone equally. Specific groups are more likely to have regretted using BNPL to pay for something.

While 26% of buy now pay later users have regretted using it, this rises to:

- **31%** of black users
- **34%** of users claiming benefits
- **35%** of users aged 18-34
- **35%** of users who have had their employment impacted by covid
- **39%** of disabled users
- **63%** of transgender users

For almost all of these groups, the most common reason for this regret was that the amount they ended up paying in the end was more than they expected.

Systemic oppression and inequality affects people's finances and impacts how much they can afford to spend. This leaves people from marginalised groups disproportionately hit by a lack of protections around BNPL affordability.

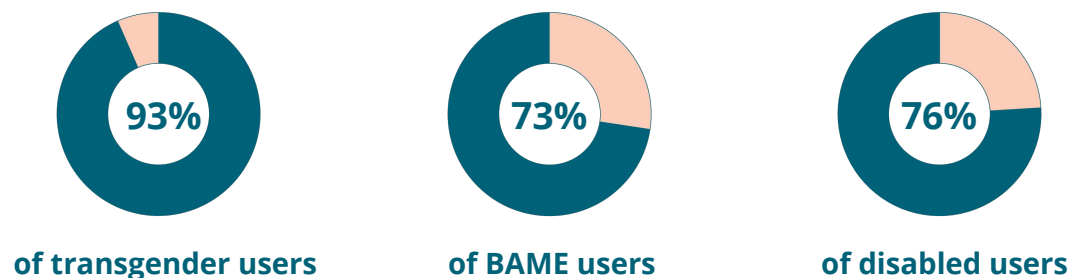
While **41%** of all users have struggled to make a BNPL repayment in the last 12 months, this rises to:

87%
of transgender users

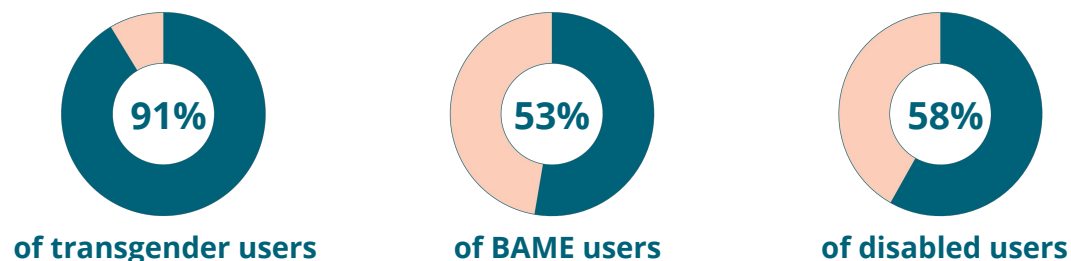
52%
of BAME users

60%
of disabled users

Problems with affordability have a knock-on effect on people's wider financial situations. The following percentage of users in debt or with another repayment have gone without paying for another debt because of a BNPL fee or repayment:



And people who weren't able to afford essentials like bills and rent because they were making BNPL repayments include:



A dark teal silhouette of a woman standing and facing right. She has long hair and is carrying a large shopping bag over her right shoulder. A dotted line extends from the top of the bag towards the title box.

Diana's story

Diana has multiple serious mental health conditions including PTSD and bipolar disorder. One of the symptoms that Diana experiences is impulsivity, which causes her to online shop compulsively.

Recently, Diana took out agreements with 3 separate buy now pay later providers. She was able to sign up for these while owing nearly £6,000 in other debts that she's struggling to manage.

In total, Diana took out **£279.61** worth of products with the 3 providers. This was much more than she could afford to pay back, even in instalments, but she wasn't subject to affordability checks which could have flagged this.

After taking these agreements out, Diana had her working hours reduced from 32 hours per week to 16.5 hours. She was already struggling, but with her ability to afford her buy now pay later repayments now even less than it was before, she's scared about how she'll make the repayments - as well as the late fees she could face if she misses them.

BNPL changes people's attitudes to credit

Using BNPL, and seeing adverts for it, affects attitudes to credit.

BNPL users are at risk of becoming more reliant on it as a payment method. 29% of BNPL users always or often use it when it's offered. This increases to 40% of people who see BNPL advertised once a week or more.

This is unsurprising given BNPL products are often marketed as being a smooth and easy way to pay, and as more affordable than buying outright.

Buy now pay later isn't always felt to be as serious as other forms of credit, especially to those who use it. 40% of people who have used BNPL in the last year don't view it as 'proper' borrowing, compared to 17% of people who haven't used BNPL in the last 12 months.

People are also more likely to routinely use BNPL if they have other debts or repayments. Only 16% of people without any other debts or repayments always or often use BNPL, compared to 40% of people who do. This indicates that people with other debts may have a greater need to use BNPL.

BNPL can act as a gateway to using other forms of credit

44% of BNPL users have used another form of lending such as a credit card, overdraft, or short term loan for the first time since using BNPL.

Nearly 1 in 3 of them say it's unlikely they'd have taken out these types of credit without having used BNPL first.

There are two likely reasons for this:

- 1) Using BNPL has worsened their financial situation, making them more reliant on credit.
- 2) The ease of using BNPL has relaxed people's attitudes to credit, making them more likely to use other forms of credit.



Upcoming regulation should focus on 4 themes:

Following the Woolard Review, the FCA and government have committed to bringing buy now pay later products into the scope of regulation.

Based on our evidence, we suggest regulation should focus on 4 themes:

1. Product design
2. Information and understanding
3. Affordability
4. Fair and consistent treatment of people in financial difficulty

1. Product design

The way a BNPL product is designed and presented at the checkout has a significant impact on how people engage with it. Currently, the process for signing up to use BNPL is so smooth that people frequently use it by accident. However, when it comes to setting up payments or finding information about late fees there is friction built into the customer journey that makes it harder for people. Regulation should ensure that products are designed to protect consumers.

The FCA should establish what kind of customer journey is required to allow people to make informed choices, and where friction needs to be added or removed to enable that. This could include adding more stages and affordability checks to the sign up process, clearer information about repayment methods and an easier process for seeking help.

2. Information and understanding

In designing regulation, the FCA should seek to understand what information customers need to make a considered decision on using BNPL.

It's important that customers understand BNPL is a credit product, what happens if they're not able to pay, the impact this will have on their credit score, and where they can go to get help.

As well as thinking about *what* information customers need, the FCA should carefully consider *how* this is provided. What information should be shared at which stage of the customer journey? And how can that information be presented to help people engage with it?

Upcoming regulation should focus on 4 themes:

3. Affordability

While BNPL can be a useful product for some, our evidence suggests that for others it can encourage them to spend more than they can afford. The result for these people can be difficulty budgeting, late fees and spiraling debts.

In designing regulation, the government and FCA should focus on ensuring affordability checks are conducted and that they're consistent. If possible, affordability checks should take into account BNPL products an individual has taken out with other providers.

Affordability should be a central theme of regulation and go beyond affordability checks at the point of purchase. The way information is presented at the checkout (e.g. the price presented) and in adverts should not actively encourage people to spend more than they can afford.

4. Fair and consistent treatment of people in financial difficulty

When people do struggle to meet repayments, they should expect the same support from all BNPL providers.

Consumers should be clearly signposted throughout the customer journey to support available if they're struggling to make repayments. They should also have access to the Financial Services Ombudsman if they need to access impartial dispute resolution.

Approaches to late fees should also be consistent. This could be achieved by setting a centralised cap on the value of fees and specifying the minimum time that firms must give customers before imposing fees.

Any debt collection methods practiced by BNPL providers should be fair and consistent with the standards expected of other firms regulated by the FCA.

Methodology

The evidence in this report is based on a nationally representative survey of 10,000 UK adults. Where the term 'BNPL users' is mentioned, we are referring to the 2,700 respondents that had used buy now pay later in the past 12 months.

Citizens Advice commissioned Opinium to carry out the survey. The survey took place online between 28th January and 14th February 2021.

The case studies in the report are based on the stories of clients who have contacted Citizens Advice, either through our local offices or our consumer service. The names of case studies have been changed to preserve their anonymity.

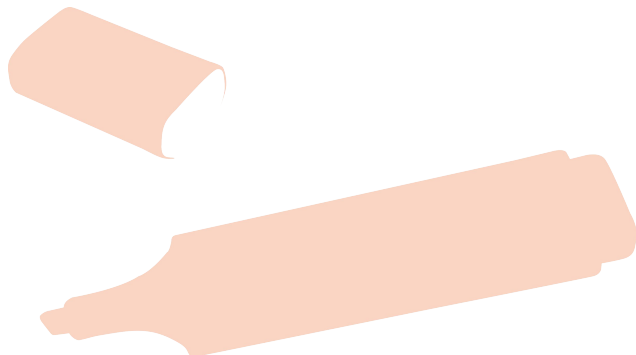
Calculations

14.4 million people have used buy now pay later in the last 12 months based on 27% of UK adults saying they have done so in a nationally representative survey. The projected UK adult population for 2018 is just over 52 million, 27% of which being 14.4 million.⁴

1.4 million people have regretted using BNPL because it was more than they could afford based on 3.8 million users having regretted using BNPL (26% of the 14.4 million people who have used BNPL), and 37% of these giving this as a reason for regret.

External references

1. These providers were identified in the FCA's [Woolard Review](#).
2. [The Behavioural Insights Team and Citizens Advice - Applying behavioural insights to regulated markets](#)
3. As above
4. [ONS Projected UK population statistics](#)



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